

EXHIBIT A

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VIA EMAIL

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United States Attorney for the Southern District of New York
One Saint Andrews Plaza
New York, New York 10007

December 20, 2016

United States v. Carlos ZAVALA-VELASQUEZ, et al.
15 Cr. 175 (LGS)

Dear Mr. Bove,

This letter is being sent to you on behalf of Mr. Zavala, to request both Discovery and a Bill of Particulars, as set forth below, and in anticipation of motions due this coming Friday, December 23, 2016.

Discovery received to date, reservation of right to make additional requests

As a preliminary matter, the discovery provided to me to date consists of a CD-ROM and a USB drive containing approximately 120 GB of data. I have yet to review the contents of the USB drive with my client for two reasons. First, as you are aware, I only recently discovered the USB drive. Second, the USB drive is, as you are also aware, unacceptable for review at the MCC, New York, where Mr. Zavala is being held.

Therefore, I reserve the right to make additional requests, based on a thorough review of all the discovery received to date.

I also reserve the right to make further requests based on additional discovery that might be provided, or as the need may arise.

Join in requests made by co-counsel

I have had the opportunity to review the extensive letter dated December 19, 2016 sent to you requesting discovery and a bill of particulars by Linda George, Esq., counsel for codefendant Juan Manuel Avila-Meza.

I join in all those requests on behalf of Mr. Zavala, and incorporate them herein by reference.

I also join in the miscellaneous requests sought by Ms. George in her letter, as well as any other requests made by other counsel as may be filed with you.

Additional requests

I also request copies of all those materials the government is seeking in its MLAT request sent to Honduras on August 8, 2016 ("MLAT Request") as may pertain to Mr. Zavala, and to which, you have advised, the government has yet to receive a reply. You sent defense counsel a copy of the MLAT Request on December 15, 2016, following our status conference before Judge Schofield earlier that same day.

In the MLAT Request, the government references the Special Commission in Honduras, established in April 2016 primarily to investigate corruption in its national police force ("PNH"). Specifically, the MLAT Request asserts that the Special Commission "is believed to have commenced investigations of [the Defendants in this case, including Mr. Zavala] prior to the time the United States announced the charges against the Defendants." MLAT Request, p.4.

Further, the government has also requested records be produced by the Honduran Special Commission. Specifically, the government has requested "certified copies of:

1. all reports, investigative files, and evidence presented to, evaluated by, or obtained by the Special Commission in connection with its investigation of the Defendants; and
2. all reports prepared by the Special Commission reflecting its determinations, conclusions, and disciplinary decisions with respect to the Defendants." MLAT Request, p.9.

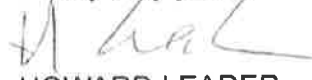
Accordingly, I request copies of any and all of the materials pertaining to Mr. Zavala sought by the MLAT Request as soon as you receive them.

I also request copies of any and all communications between the Special Commission and any agency of the United States, including but not limited to the Drug Enforcement Administration and the Department of State, which relate to Mr. Zavala, regardless of form or type, as well as any and all notes, reports, memoranda and the like, related thereto.

Finally, I also request any and all records of any communication, regardless of form or type, between any agency of the United States, including but not limited to the Drug Enforcement Administration, and the PNH that relates to Mr. Zavala.

I would appreciate your response as soon as possible, again given that this coming Friday, December 23, 2016 is the due date for discovery motions. I thank you in anticipation.

Very truly yours,



HOWARD LEADER

cc: Matthew Laroche, Esq.,
Assistant United States Attorney (VIA EMAIL)

Counsel for codefendants Juan Avila-Meza, Victor Lopez-Flores, Mario Mejia-Vargas
and Ludwig Zelaya-Romero (VIA EMAIL)